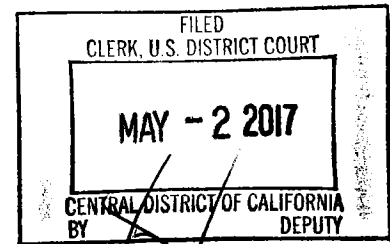


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9 Attorneys for James Sexton



10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

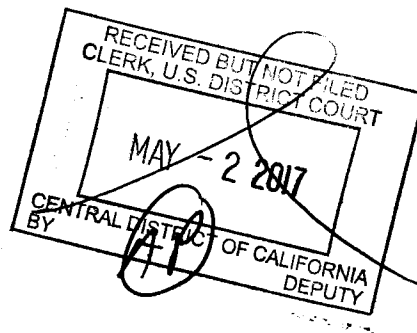
15 LEROY BACA,

16 Defendant.

CASE NO. CR-16-00066-PA

**NOTICE OF FILING OF
LETTERS FROM JAMES
SEXTON AND KEELY SEXTON
REGARDING LEROY BACA**

[Notice of Manual Filing filed
concurrently herewith]



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28
ORIGINAL

1 At the request of James Sexton, his counsel, Thomas P. O'Brien of Paul
2 Hastings LLP, hereby submits the attached two letters regarding Leroy Baca.

3
4 DATED: May 2, 2017

THOMAS P. O'BRIEN
PAUL HASTINGS LLP

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6 By: 
7 THOMAS P. O'BRIEN

8 Attorneys for James Sexton
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James M. Sexton
Los Angeles, CA

The Honorable Percy Anderson
United States District Court
First Street Courthouse, 350 W. 1st Street
Los Angeles, California 90012

Judge Anderson,

I understand the entire Operation Pandora's Box matter has consumed an exorbitant amount of your time and docket. As a member of this conspiracy, I am not naïve that I am one of the common denominators in this matter. It is my intent and purpose to provide additional insights into Mr. Leroy Baca as a person rather than the Former Sheriff of Los Angeles County. My observations are based from a perspective of a child, young man, and a subordinate with a budding career in Mr. Baca's former Department. Not only was my career expendable but a multitude of lives were considered an acceptable loss in Mr. Baca's nefarious calculus to obstruct justice and lie to both his community and Federal Authorities. Please consider in advance that I too once believed Mr. Baca was a benevolent and prolific agent for change. However, looking back on a relationship that spans well over half my life, I see Mr. Baca's character based on more self-centered, ambitious, and apathetic pillars that he gilded with false virtues and core values.

My first interaction with Mr. Baca was in the Fall of 2000. My family hosted him in Tuscaloosa, AL. At this time, Mr. Baca was a neophyte Sheriff to the largest Sheriff's Department in the Country. My father was on the Board of Directors for the National Sheriff's Association (NSA) and the way he spoke about Mr. Baca years prior made Baca seem larger than life to me. However, having finally met Mr. Baca in person in 2000, I saw some startling character flaws that could only be observed from someone who had nothing to offer Baca. What is even worse, Baca created the first of many rifts between my father and me as a result of Baca's lie and manipulation. It was a foreshadowing event to say the least.

Mr. Baca was working his way through a buffet at a function hosted by my family. It is custom in the South to ensure your family's guest are attended to. Mr. Baca had his back to me and was positioned in the room where it was impossible to approach him from the front, so I did my best to announce my presence from within his peripheral vision and off to the side. As I announced myself, he turned to me and shot me a perturbed look. I identified myself as Sheriff Sexton's oldest son and then thanked him for traveling to Alabama and working with my father. Later, my father came to me and scolded me for being rude and inappropriately addressing his friend.

It shocked me Mr. Baca misrepresented the interaction as disrupting, inappropriate, and disrespectful to his title. My first impression of Baca was never a positive one, in fact, he and I were circumspect of one another my entire career. I joined the County of Los Angeles Sheriff's Department because of the men and women within the rank and file that impressed me with their demeanor. It is these quiet professionals that I pray you consider a first priority in addition to the Law Enforcement Community as a whole while you sentence Mr. Baca. In a cruel irony, Baca's "Core Values" were used against them, while he was never held accountable for any of his actions or orders. To date, Mr. Baca has done everything to defend himself in the court of public opinion, preserve his legacy as a progressive law enforcement executive, and separate himself entirely from the blue collar members of Operation Pandora's Box.

My final interaction with Mr. Baca occurred in April 2013 and I believe it speaks volumes to his personal beliefs, his leadership style, and the executive he truly is. As the record shows, the

James M. Sexton
Los Angeles, CA

department was embroiled with internal strife originating from Baca's selection for Undersheriff, clashing with partner agencies, and the overall morale was at an all-time low. Mr. Baca would routinely represent to my father that I was reporting "line gossip and dissent", all while defending his handpicked Executives. Mr. Baca stated to me, "my executives are the hardest working and finest men and women in the Department because I picked them!"

I made an effort to capitalize on what I believed to be a moment to speak truth to power. I explained to Mr. Baca how people in the department were frustrated about the systemic callous indifference that line personnel received from Executives when they report anything that negatively affected the department. I even went as far to share stories about fellow deputies who had succumbed to substance abuse and how I had just lost a partner to suicide; who carried out the act in his Los Angeles County Sheriff's Department Class A Uniform. Baca replied, "there are many variables in that equation, which I am not one nor am I responsible for it". That was my last personal conversation with Mr. Baca and he continues to validate my observations to date.

Regardless of my personal insights, I understand my reporting will always be considered bias. However, I ask you consider what letters are not in Mr. Baca's portfolio and what were the motivations/reciprocations of the people wrote on his behalf. Your Honor, you will be hard pressed to find anyone who had nothing to offer Mr. Baca, but required to sacrifice everything at a moment's notice in his filings. What is even more startling is there are representatives of Organizations within his letters of consideration that are supposed to be gatekeepers and safeguards to what the badge means.

Even as I am writing this letter, people are citing Mr. Baca's National Sheriff of the Year as a reason not to send him to prison. This is an extremely disconcerting representation for several reasons. The National Sheriffs' Association is an organization made up of mostly elected Sheriffs who should hold their peer accountable for his actions. They should be the first to protect the meaning of what it is to not only wear the badge, but lead by example. Sheriff Baca wishes to receive all the glory of being Sheriff but none of the burden of leadership for orders he issued. Sadly, this is not the first Sheriff to remain uncounseled for his actions, which would have otherwise been a career ending event for any other person in law enforcement. Your sentencing alone could send the message these constituencies so desperately need in today's community relations environment.

Mr. Baca has always positioned himself as uninformed, fragile, or a victim, while in reality he is a calculated and capable political operator who can summon hundreds of powerful supporters armed with plausible stories that require your consideration and leniency. I respectfully request you consider the long term consequences of letting the Captain of an industry be held to less of a standard than his subordinates. Mr. Baca is a victim of the totality of his decisions, which includes his choice for Undersheriff and sacrificing the even lesser in his chain of command.

In a national environment of community relations, this sentence is an opportunity to send a message that no one is above the law, least of all an elected official entrusted with enforcing it. As the highest-ranking member of the nation's largest sheriff department, and a man who instituted accountability as a core value in his organization, Mr. Baca should be the first in line to agree with me.

Respectfully,


James M. Sexton

The Honorable Percy Anderson
United States District Court
First Street Courthouse, 350 W. 1st Street
Los Angeles, California 90012

Judge Anderson,

First, I would like to thank you for your time in reading this letter. My name is Keely Sexton. I am the wife of James Sexton and an unbeknownst victim of Operation Pandora's Box and former Sheriff Leroy Baca. I am the one who is always seen and never heard, but I would like my voice to be recognized today.

I can clearly remember the first time I met Lee Baca. It was a Saturday afternoon in the summer of 2010. At the time, I was 25 years old and a new transplant to California and James' parents were in town staying at the Bonaventure Hotel in downtown Los Angeles. James and I went to the hotel to visit with them before they headed off to dinner with a friend. I soon came to find out that the friend was then Sheriff Leroy Baca. Before that day, I did not know much about Lee. The only thing I knew was that he had been Sheriff for a while and was a well known politician with a lot of celebrity endorsements and powerful political ties. When he appeared before me, all I saw was a frail thin man but when I shook his hand and introduced myself I immediately felt and knew something was not right about him. His handshake and interaction with me was extremely superficial and hurried. Like most things with Mr. Baca, if it was not something of sustenance, power, importance, or in anyway beneficial to him he overlooked it; and at the time that is how he viewed me.

Fast forward to winter 2013. I attended the Los Angeles Sheriff Department (LASD) Reserve Dinner in Commerce with my father-in-law. I saw Sheriff Lee Baca from afar and even made brief eye contact with him but he never approached me. As we were leaving the dinner, he ran after us in the parking lot to speak to me. At the time, James had a lawsuit against Baca and the Department and he was in the midst of an indictment for Operation Pandora's Box. When Baca caught up with us outside the banquet, he began carrying on a lengthy conversation with me (and barely acknowledging my father-in-law). As much as I politely tried to end the interaction, he persisted to continue talking and asking questions. He started off with small talk and then moved on to asking a lot of about James and how he was doing, our new home, and other personal information. His demeanor was pleasant but I saw past that and for what it really was: a sugarcoated threat. He was attempting to placate me and use me as another pawn in his game of chess. It is said that the only thing that matters on a chessboard is a good move. Well, this next move is mine.

I am a true believer that events and people come in our lives for a reason and that everything has a greater purpose. I am a recovering bulimic and an advocate for eating disorder awareness and instilling self-confidence in young girls and women. A few months back, it hit me that I went through this illness and rehab years ago to learn the coping skills and gain the inner strength to be able to handle the stresses due to Pandora's Box and Leroy Baca. It essentially prepared me for the darkness and insanity that I have lived through over the past six years. But from darkness there comes light. On April 13, 2013, I married my best friend James. Although these past four years of marriage have not been ideal, I would not have anything changed. Due to Operation Pandora's Box and the aftermath, we have grown as individuals and our marriage has strengthened exponentially. And for that I am extremely grateful.

However, that does not diminish the totality of the role that Mr. Baca played and his blatant disregard of people to preserve his legacy and name. Not only did he put my husband's life at risk but he put my life and safety at risk all in an effort to maintain his title and public perception. His calculated corrupt moves and self-serving political motives are seen throughout his entire career and are clearly

masked by national awards and his implementation of his LASD Core Values. Many people suffered and fell due to his abuse of power; all the while he hid behind his tarnished badge and executive office desk. His actions should not go unnoticed, let alone warrant a sentence leniency. To this day, Leroy Baca continues to overtly play victim, deny any responsibility, place blame elsewhere, and maneuver the pieces in his chess game. I respectfully inquire that consideration be made in your decision of his sentencing to reflect all of his callous actions and intents.

Lee Baca has taken a lot from me: years of my life, many nights of sleep, a feeling of safety, and at times my happiness and sanity. However, he will never take away my strength, dignity, and, most importantly, my voice. Your Honor, I am extremely appreciative for your time in reading this. I am aware that I am just one letter in a sea of letters mostly written by persons of influence, high powered individuals, and people with strong community ties. So with that, I am thankful for being allowed the chance to speak. If not for myself, then for those who do not have a voice or the opportunity to come forth.

Respectfully,

A handwritten signature in black ink, appearing to read 'Keely Sexton', with a stylized, cursive script.

Keely P. Sexton

PROOF OF SERVICE

STATE OF CALIFORNIA)
CITY OF LOS ANGELES AND COUNTY OF) ss:
LOS ANGELES)

I am employed in the City of Los Angeles and County of Los Angeles, State of California. I am over the age of 18, and not a party to the within action. My business address is 515 South Flower Street, Twenty-Fifth Floor, Los Angeles, California 90071-2228.

On May 2, 2017, I served the foregoing document(s) described as:

**NOTICE OF FILING OF LETTERS FROM JAMES SEXTON AND KEELY
SEXTON REGARDING LEROY BACA**

on the interested parties by placing thereof in a sealed envelope(s) addressed as follows:

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Attorneys for United States of America



VIA OVERNIGHT MAIL:

VIA _____: By delivering such document(s) to an overnight mail service or an authorized courier in a sealed envelope or package designated by the express service courier addressed to the person(s) on whom it is to be served.

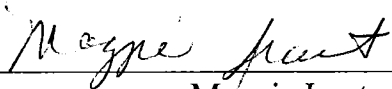


VIA U.S. MAIL:

I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice such sealed envelope(s) would be deposited with the U.S. postal service on May 2, 2017 with postage thereon fully prepaid, at Los Angeles, California.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on May 2, 2017, at Los Angeles, California.


Maggie Icart